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James S. Richter

*Attorneys for Defendants,
Somerset Therapeutics, LLC,
Somerset Pharma, LLC and Odin Pharmaceuticals, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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	: Honorable Brian R. Martinotti, U.S.D.J..
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	: C.A. No. 2:24-cv-7791-BRM-CLW
IN RE SELENIOUS ACID LITIGATION	: (consolidated)
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	: DECLARATION OF KURT A. MATHAS
	: IN SUPPORT OF APPLICATION FOR
	: ADMISSION PRO HAC VICE
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KURT A. MATHAS, of full age, hereby declares as follows:

1. I am a partner with Winston & Strawn LLP, attorneys for Defendants, Somerset Therapeutics, LLC, Somerset Pharma, LLC and Odin Pharmaceuticals, LLC (collectively “Somerset Pharma”) in the above-captioned matter.

2. This Declaration is submitted in support of my application for admission *pro hac vice* in this matter.

3. I principally practice law in Winston & Strawn’s Chicago, Illinois offices, which are located at 35 W. Wacker Drive, Chicago, Illinois.

4. I am duly admitted and currently in good standing to practice law in the following jurisdictions, for which I list my year of admission and the address of the official or office maintaining the roll of such members of its bar:

Bar/Court Name	Name and Address of Office or Official Maintaining the Roll of Members of the Bar	Year of Admission
Illinois	Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois 130 East Randolph Street, Suite 1500 Chicago, Illinois 60601	2005
U.S. District Court – Northern District of Illinois	U.S. District Court – Northern District of Illinois 219 S. Dearborn Street, Room 2050 Chicago, Illinois 60604	2005
U.S. Court of Appeals for the Federal Circuit	U.S. Court of Appeals for the Federal Circuit Clerk’s Office, Room 401 717 Madison Place, NW Washington, D.C. 20439	2009
U.S. Court of Appeals for the Seventh Circuit	U.S. Court of Appeals for the Seventh Circuit 219 S. Dearborn Street, Room 2722 Chicago, Illinois 60604	2013
U.S. District Court – Eastern District of Texas	U.S. District Court – Eastern District of Texas Attorney Admissions Clerk 300 Willow, Room 104 Beaumont, TX 77701	2013
U.S. District Court – District of Colorado	U.S. District Court – District of Colorado Clerk’s Office, Alfred A. Arraj U.S. Courthouse, Room A-105 901 19 th Street Denver, CO 80294	2013
U.S. District Court – Western District of Michigan	U.S. District Court – Western District of Michigan 399 Federal Bldg. 110 Michigan St NW Grand Rapids, MI 49503	2017

U.S. District Court – Eastern District of Michigan	U.S. District Court – Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd. Detroit, MI 48226	2023
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5. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

6. I will be associated in this matter with James S. Richter of Midlige Richter LLC, who is the attorney of record for Somerset Pharma and a member in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey.

7. Somerset Pharma has requested that I be involved in their representation in this matter.

8. There is good cause for my admission *pro hac vice* in that I have particular knowledge and expertise regarding Somerset Pharma's business and the facts and legal issues presented by this matter.

9. I have never been denied admission *pro hac vice* in any jurisdiction.

10. I also understand that upon admission *pro hac vice*, I am subject to the orders, and amenable to disciplinary action and the civil jurisdiction, of this Court and the New Jersey State Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to notify the Court immediately of any matter affecting my standing at the bar of any other court. I shall abide by Local Civil Rule 101.1(c).

11. I will make a payment of \$250.00 pursuant to *L. Civ. R. 101(c)(3)* payable to the Clerk, U.S. District Court and will pay, if not already paid, the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order.

12. Plaintiffs' counsel has consented to my *pro hac vice* admission.

13. For the foregoing reasons, it is respectfully requested that the Court grant this application to have me admitted *pro hac vice* to appear and participate as counsel in this matter pursuant to Local Civil Rule 101.1(c).

I hereby declare under penalty of perjury, that the foregoing statements made by me are true and correct.

A handwritten signature in black ink, appearing to read "Kurt A. Mathas", followed by a long horizontal line extending to the right.

Kurt A. Mathas

Dated: December 3, 2024